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FEDERAL COMMUNICATIONS COMMISSION
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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the matter of

Billed Party Preference
for 0+ InterLATA

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CC Docket No. 92-77
Phase I

COMMENTS OF LinkUSA

Steven J. Hogan
President
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March 18, 1993

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COMMENTS OF LinkUSA CORPORATION

LinkUSA hereby submits its comments in the above-captioned proceeding in which the Commission seeks comment on several Petitions For Reconsideration filed in response to the Commission's decision not to require implementation of a concept known as "0+ Public Domain."¹ As a wholesale provider of interstate operator-assisted services, LinkUSA enables third tier² customers to offer enhanced products such as travel features, information services, and operator-assisted calling to their customers. Thus, LinkUSA has a vested interest in the outcome of this proceeding and offers the following comments in support of the CompTel Petition For Reconsideration.

¹Billed Party Preference for 0+ InterLATA Calls, Report and Order and Request for Supplemental Comment, CC Docket No. 92-77 Phase I, FCC No. 92-465, Released: November 6, 1992. "Order".

²The term "third tier interexchange carrier" is used by LinkUSA to denote interexchange carriers whose annual revenues do not exceed \$120 million. LinkUSA research indicates that over 300 such companies are currently operating throughout the United States.

Taken together, the problems outlined in the CompTel Petition For Reconsideration point to a structural defect, not only in the CIID proprietary card product, but also in the operator service provision marketplace. Given that the Commission works to provide for the public good, the Commission correctly sought to resolve these problems. However, LinkUSA agrees with the CompTel Petition For Reconsideration that the Commission did not resolve the issues in a manner consistent with its own conclusions in the final order.

LinkUSA believes the public is served best by a system which allows consumers to accurately direct their frustration toward the party that is capable of addressing the source of their frustration. Since AT&T is the only party that independently can address the underlying structural issues and they choose not to, it falls to the Commission to force a change. As CompTel suggests the steps taken by the Commission do not force this change rapidly enough when, by its own testimony, "immediate action"³ is required.

LinkUSA continues to believe that 0+ in the public domain is the optimal solution for all concerned and it urges the Commission to mandate that the traditionally assumed "0+ Public Domain" as requested in the CompTel Petition for Reconsideration.

³Order at 1.

Respectfully submitted,
LinkUSA Corporation

A handwritten signature in black ink, consisting of several overlapping, stylized loops and strokes, positioned to the right of the typed name.

Certificate of Service

I, Ashley Waltmann, hereby certify that a copy of the foregoing Comments of LinkUSA was served by Federal Express this 18th day of March 1993 to the persons listed below.

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Ashley Waltmann

March 18, 1993